

NORTHERN REGIONAL MEDICAL COMMAND INSPECTOR GENERAL

Inspection of Facilities Used to House Warriors in Transition

Period of Inspection 7 March 2011–22 July 2011



DEPARTMENT OF THE ARMY NORTHERN REGIONAL MEDICAL COMMAND 9275 DOERR ROAD FORT BELVOIR, VA 22060

MCAT-CG

MEMORANDUM FOR The Surgeon General/Commanding General, U.S. Army Medical Command

SUBJECT: Inspection of Facilities Used to House Warriors in Transition (FY 11)

- 1. I approve the findings and recommendations in the enclosed Inspector General report on the "Inspection of Facilities Used to House Warriors in Transition for FY 11".
- 2. Upon receipt of Department of Army Inspector General and The Surgeon General / Commanding General USA MEDCOM concurrence, I authorize its immediate release to the organizations listed below and on the Northern Regional Medical Command's internet web pages.

Encls as

CF: (w/encls)
Congressional Defense Committees
Assistant Secretary of Defense for Health Affairs
Department of Defense Agencies
Secretary of the Army
Installation Management Command
MEDCOM/OTSG OneStaff





DEPARTMENT OF THE ARMY NORTHERN REGIONAL MEDICAL COMMAND 9275 DOERR ROAD FORT BELVOIR, VA 22060

MCAT-IG

MEMORANDUM FOR Commander, Northern Regional Medical Command (NRMC)

SUBJECT: Final Report on the Special Inspection of Facilities Used to House Recovering Service Members (Warriors in Transition)

- 1. Purpose. Obtain the NRMC Commander's signature on the enclosed Special Inspection of Armed Forces Housing Facilities of Recovering Service Members.
- 2. Discussion. On 21 October 2010, the NRMC Commander directed the "Inspection of Facilities Used to House Warriors in Transition".
- 3. The inspection teams identified 18 findings and 3 observations and made recommendations for corrective action related to the objective. A summary of findings and observations are included in chapter 3.
- 4. The Summarized Findings are presented in the Executive Summary.
- 5. Recommendation. That the RMC Commander:
 - a. Approve the final report.
- b. Authorize its immediate release to The Surgeon General, Congressional Defense Committees, Assistant Secretary of Defense for Health Affairs, Department of Defense Agencies, Secretary of the Army, Installation Management Command, MEDCOM/OTSG OneStaff and posting on the NRMC Command's internet web pages.

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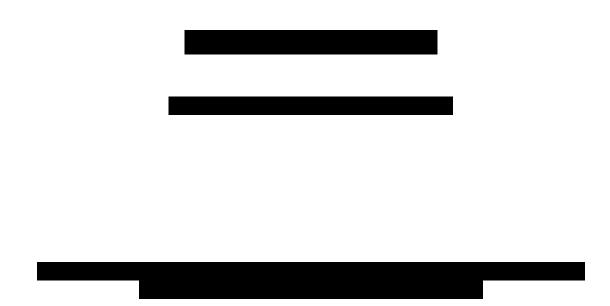


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Executive Summary

- 1. **Background.** On 18 September 2007, the Deputy Secretary of Defense (DEPSECDEF) promulgated standards for facilities housing Warriors in Transition (WTs) who are receiving outpatient medical care. These standards focus on the areas of assignment, baseline accommodations, and special medical requirements. On 28 January 2008, Public Law 110-181, Sec 1662 was enacted requiring the Regional Medical Command (RMC) Inspectors General (IGs) to conduct semi-annual inspections of all WT housing semi-annually for the first two years and annually thereafter; to submit a report on each facility inspected to the post commander, the Secretary of the Military Department concerned, the Assistant Secretary of Defense for Health Affairs, and the Congressional Defense Committees; and to post the final inspection report on their respective Internet Website. To facilitate the conduct of the inspections, Headquarters, Department of the Army, issued guidance via ALARACT 162/2008 on 3 July 2008 to all Army activities. This message directed US Army Medical Command (MEDCOM) RMC IGs, in coordination with Installation Management Command (IMCOM), to oversee the inspection effort. It also provided the RMC IGs authorization to task staff members and IGs assigned to senior commanders and IMCOM as well as "unlimited access to Army activities, organizations, and all information sources necessary to complete the inspection". On 10 September 2010, the Commanding General, US Army Medical Command directed Commanders of Regional Medical Commands to issue a directive to their IGs to conduct the "Special Inspection of Facilities Used to House Recovering Service Members". On 21 October 2010, the RMC CG issued the directive to the Command Inspector General to conduct the "Special Inspection of Facilities Used to House Recovering Service Members.
- 2. **Purpose.** The purpose of the inspection was to evaluate the adequacy of facilities used to house Warriors in Transition.
- 3. **Concept**. The NRMC IG, leading a team of IMCOM and Senior Mission Command Inspectors General and augmented with subject-matter-experts, conducted the inspection of the facilities located at nine (9) installations within the NRMC region.
- 4. **Objective.** Determine if facilities used to house Warriors in Transition are in compliance with Memorandum, Deputy Secretary of Defense, 18 September 2007, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.
- 5. Summary of Findings, Observations, and Recommendations.
- a. The inspection teams determined that most of the Warrior in Transition Units (WTUs) in the region were in compliance with the DoD Housing Inspection Standards for Medical Hold and Holdover Personnel. Overall, the inspection teams determined that recovering service members were assigned to housing facilities that best meet their needs. Most recovering service members were satisfied with the daily operations within their WTUs. As well, the Warriors in Transition (WTs) were also satisfied with their respective Installations' support in addressing their housing concerns.





Additionally, the Installation Management Command's (IMCOM), Directorate of Public Works (DPW), in coordination with the privatized housing agencies, consistently responded to WTs with housing issues through prompt resolution of service requests (work orders). Most WTs were given the appropriate priority level for service requests in accordance with the housing inspection standards. The inspection teams found that throughout the region, this priority service did not negatively impact the Installations' ability to resolve work order requests for the balance of their populations. Largely, the barracks and housing maintenance teams at each installation were competent and efficient in resolving issues once identified.

- b. The inspection teams determined that most of the WTUs in the region met the Baseline Standards in accordance with (IAW) the published memorandum stated above. Minor deficiencies identified were usually corrected on the spot or within 24 hours of submission of the work order. Leaders at all levels of the commands continuously searched for ways to improve or upgrade the facilities and furnishings in order to enhance the quality of life and further enhance the healing process.
- c. All of the installations in the region were aggressively seeking methods to improve the quality of life for the WTs through renovation projects, modifications and structural designs for new facilities. These included consideration for WTs with various types of illnesses or injuries, to include cognitive and/or visual limitations or those who may be experiencing Post Traumatic Stress Disorder (PTSD), Traumatic Brain Injury (TBI), or other behavioral health issues associated with PTSD. The inspection teams recognized a notable degree of consideration was used when selecting furnishings, flooring, neutral colors, and patterns free from complex geometrical shapes or designs. Two installations completed the construction phase of a new complex to house WTs and two installations are currently completing construction of new facilities with completion dates scheduled for the upcoming year.
- d. During the period of the inspection, the region had an average population of 3286 WTs. Out of the total average, 1887 areas were inspected which accounted for approximately 57% of the population. The inspection team leaders utilized interviews as an information-gathering method and interviewed approximately 20% of the WT population. The interviewees included the WTU Commanders, First Sergeants, platoon sergeants, squad leaders, nurse case managers, available WTs and family members. Overall, the leadership in each unit demonstrated an understanding of the standards, policies, and guidelines which applied to the WT program. Most of the WTs interviewed commented that their medical needs were being addressed appropriately and that they were receiving quality medical care. Most WTs were aware of and actively participating in their CTP (Comprehensive Transition Plans).
- e. In summary, most of the WTU facilities within the region were in compliance with Memorandum, DEPSECDEF, 18 September 2007, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel. The inspection teams made recommendations to the respective chains of command and the Installations' Senior Mission Commanders (SMC) or their representatives as appropriate; all of which were well received.

Chapter 1 Objectives and Methodology

- 1. Objective. Determine if facilities used to house Warriors in Transition are in compliance with Memorandum, Deputy Secretary of Defense, 18 September 2007, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.
- 2. Inspection Team. The inspection teams consisted of at a minimum: 1) IG Team Leader, 2) Installation IG Coordinator; 3) DPW subject-matter-expert (SME); 4) Safety SME; 5) Information Management (IM) SME; 6) privatized housing representative; 7) Medical personnel and/or Nurse Case Managers, and 8) WTU leadership/escorts.

3. Methodology.

- a. Observation: The inspection teams inspected the following types of Warrior in Transition occupied facilities: DoD Owned Unaccompanied Personnel Housing (UPH), DoD Lodging (Appropriated/Non Appropriated), Leased/Contracted Housing and Lodging, Privatized Housing and Lodging. Assessment of Privatized Family Housing was conducted with the consent of the occupant and in coordination with the privatized housing management. All family housing on the inspected installations were managed by a privatized housing partner, so therefore, the inspection team did not inspect any DoD Owned Family housing.
- b. Document Review. The inspection teams reviewed the following documents: 1) Work Order requests; 2) WTU policy memorandums; 3) guidance specific to WTUs; 4) Installation/local policies and Standard Operating Procedures (SOPs).
- c. Interviews. The inspection teams conducted interviews with the WTU Commanders, First Sergeants, Platoon Sergeants, other cadre/staff members, WTs and family members who were present during the inspections.
- 4. Locations Visited:
 - a. Fort Belvoir, VA
 - b. Fort Bragg, NC
 - c. Fort Dix, NJ
 - d. Fort Drum, NY
 - e. Fort Eustis, VA
 - f. Fort Knox, KY

- g. Fort Meade, MD
- h. Walter Reed Army Medical Center, Washington, DC
- i. West Point, NY
- 5. Findings/Observation Format.
- a. Where a violation of a published standard, policy, law or regulation existed, a Finding Statement was developed and is addressed in the following format:

Finding statement

Standard(s)

Root Cause

Discussion

Recommendation

b. Where there was no violation of a published standard, policy, law, or regulation, but an observation was made to improve current operations, an Observation Statement was developed and is addressed in the following format:

Observation statement Standard(s), if applicable

Discussion

Recommendation

6. In the report, quantitative terms, such as "few, some, majority, most and all" are used to describe percentile ranges linked to specific findings or observations. These terms are defined as follows:

Few 1-25% Some 26-50% Majority 51-75% Most 76-99% All 100%

Chapter 2 Good News

- 1. At one installation, the fire safety non compliance issues were reduced by 60% as a result of the enhanced relationship between the Fire Department and the Organization.
- 2. At two installations, fitness rehabilitation rooms were installed in the barracks.
- 3. At one installation, phase two construction of a new WTU complex was ahead of schedule.
- 4. Most WTs interviewed reported excellent response times to work order requests.
- 5. The overall attitudes of the WTs were good.
- 6. At a few installations, a copy of the barracks SOP was posted in every room.
- 7. At a few installations, room entry notices were posted to alert WTs of scheduled contract work or maintenance.
- 8. Most installations had safes and most WTs used them to secure their medications.

Chapter 3 Findings and Observations

NOTE: All findings stated below were based on the DEPSECDEF Memorandum as the source document. Additional standards were included as necessary.

Objective: Determine if facilities used to house Warriors in Transition are in compliance with Memorandum, Deputy Secretary of Defense, 18 September 2007, subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Finding 1.1: Three facilities did not have handicap accessible ramps installed. However, one installation has completed and installed a new ramp since the site inspection.

Standard: Department of Justice ADA Title III Regulation 28 CFR Part 36.

Root Cause: Don't Know.

Discussion: The chains of command were not aware of the requirement. The inspections teams observed at both UPH and privatized housing that handicap accessible ramps were not installed.

Recommendation(s): The inspection teams recommended ramps be installed to properly meet the slope and raise requirements as outlined in the regulation above.

Finding 1.2: Faulty Ground Fault Circuit Interrupters (GFCI) were found at a few installations.

Standard: 29 CFR 1910-304, <u>Electrical Standard for General Industry</u> required GFCIs to be operable when the outlet is installed near a water source.

Root Cause: Don't Know

Discussion: The GFCIs were either not installed according to standard or otherwise did not protect a user from electrical shock as designed. Additionally, a working GFCI on a faulty outlet could produce an electrical shock, thus creating a potential safety hazard. The chains of command were not aware of the details of the standard.

Recommendation(s): The inspection teams recommended the chains of command work with the facility engineers and submit work orders to ensure the GFCIs are either repaired or properly installed.

Finding 1.3: At a few installations, the square footage for WTs in UPH did not meet the minimum standards.

Standard: Memorandum, Assistant Chief of Staff for Installation Management (IMCOM), 14 October 2009, Subject: Unaccompanied Personnel Housing (UPH) for Warriors in Transition;



Army Regulation (AR) 420-1, Army Facilities Management, 12 Feb 08.

Root Cause: Won't Comply

Discussion: As a result of command decisions and based on an increase in the WT population, Soldiers were assigned two per room, which resulted in the WTs having less than the 90 SF minimum as required by the standard.

Recommendation: The inspection team recommended that the chain of command acquire additional UPH to accommodate WTs assigned. The inspection team also recommended that privatized or off post housing be considered.

Finding 1.4: A few installations had missing and/or inoperable smoke detectors in Unaccompanied Personnel Housing, Privatized Housing Units and Leased/Contracted Lodging.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Root Cause: Don't Know.

Discussion: There were no indicators that the smoke detectors were being inspected as required by the installation safety/fire station personnel or by the unit leadership (company cadre).

Recommendation: The inspection teams recommended that the chains of command and maintenance/safety/fire station personnel periodically check all the smoke detectors during routine inspections or WT Cadre visits, and submit work orders immediately as appropriate.

Finding 1.5: At one installation, three Privatized Housing units did not have the slip resistant strips in the bath tubs.

Standards: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Root Cause: Don't Know.

Discussion: The slip resistant strips were identified in older inventory privatized housing. The housing partner commented that the strips were installed in the newer housing, but was not aware that they were not installed in the entire existing older inventory. As well, the chain of command was not aware of the issue.

Recommendation: The inspection team recommended that the chain of command and maintenance/safety personnel periodically check bath tubs during routine inspections or WT Cadre visits, and submit work orders immediately, thus decreasing the potential for a safety hazard.



Finding 1.6: At one installation, the kitchenettes were inoperable and were placed off limits to the WTs.

Standards: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Root Cause: Won't Comply.

Discussion: The kitchenettes in a UPH facility were not refurbished as part of the overall renovation project for the building and were placed off limits to the WTs. The installation did not find it cost-effective to obligate funds for the renovation since a new WTU complex was underway.

Recommendation: The inspection team recommended that the chain of command submit orders immediately to repair the cooking facilities for the WT Soldiers.

Finding 1.7: One installation had an inoperable laundry room located at an on post DoD Lodging facility.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Root Cause: Don't Know.

Discussion: The laundry facility was closed due to minor repairs on the building. A WT stated the building occupants used a pay laundry facility across from the building. The actual location of the pay laundry facility was not in close proximity to the lodging facility. The lodging facility manager was aware of the issue; however, the chain of command was not informed.

Recommendation: The inspection team recommended that leaders at all levels ensure the laundry facilities are in good working condition. Based on this recommendation, the Senior leadership at the installation level directed certain actions and identified action officers to immediately address and resolve the issue.

Finding 1.8: A few installations had leaking and/or inoperable sprinkler systems.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Root Cause: Don't Know.

Discussion: The inspection teams identified leaking sprinkler systems. The Safety SMEs identified inoperable sprinkler systems. In each case, work orders were immediately submitted.

Recommendation: The inspection teams recommended that the chains of command, with the assistance of their local fire departments, periodically check all the sprinkler systems during routine inspections or WT Cadre visits, and continue submit work orders immediately as necessary.

Finding 1.9: One installation did not have locks installed on the entrance to the boiler room.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Root Cause: Don't Know.

Discussion: The inspection team determined that access to the building boiler room was not secured to prevent and prohibit the entrance of unauthorized personnel. A work order was submitted immediately to correct the issue.

Recommendation: The inspection teams recommended the chain of command and maintenance personnel check the access at all boiler rooms to ensure locks and entrances were properly installed and secured.

Finding 1.10: At one installation, WTs were not able to adequately control the temperature of their housing units.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Root Cause: Don't Know.

Discussion: The installation's policy to change the HVAC system from heat to cold air is dependent upon a specific time of the year, and not the actual temperature outside. The inspection occurred during an unseasonably warm time. The DEPSECDEF memorandum and its standards were brought to the attention of the Installation leadership and the HVAC system was converted.

Recommendation: The inspection team recommended that in the future, the chain of command provide either portable air conditioning units or heaters during these transition periods as needed.

Finding 1.11: One installation had a malfunctioning and or inoperable HVAC system.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Root Cause: Don't Know.

Discussion: The inspection team determined there was a malfunctioning and/or inoperable HVAC system during the review of work orders submitted by unit. The inspection team determined the malfunctioning/inoperability of the HVAC unit was attributed to the extreme changes in weather conditions. The HVAC system was replaced at the request of the chain of command.

Recommendation: The inspection teams recommended that the chain of command and maintenance check the HVAC units during routine inspections or WT Cadre visits, and submit work orders immediately for repairs.

Finding 1.12: At a few installations, flammable liquids/liquid containers were found in rooms.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Root Cause: Won't Comply.

Discussion: This is a recurring deficiency as new WTs rotate into the WTUs. This finding should have been corrected during Cadre visits/inspections. Flammable or combustible liquids must be kept in flammable liquid storage cabinets or in detached buildings. This finding is also a violation of the local SOP and fire safety regulations. An on the spot correction was made to the WTU leadership to remove the hazard.

Recommendation: The inspection teams recommended that the leadership remove the hazard immediately. Additionally, they recommended that the chains of command continue to reinforce the standard throughout their organizations.

Finding 1.13: Unapproved electrical extension plugs (without surge protectors) were found in UPH on a few installations.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Root Cause: Don't Know.

Discussion: This is a recurring deficiency as new WTs rotate into the WTUs. The only authorized electrical extension cord is one that is UL listed and has surge protector capabilities.

Recommendation: The inspection teams recommended that the chains of command continue to teach and train the WTs and enforce safety standards as appropriate to avoid hazards.

Finding 1.14: On one installation, the fire alarm system in a lodging facility was inoperable.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel

Root Cause: Don't Know.

Discussion: The inspection team was notified by the fire safety inspector that the fire alarm system was disabled due to a lightning strike from a previous thunderstorm. The system would sound at the lodging location, but the alarm was not being communicated to the fire department. The senior leadership was informed of this finding during the inspection exit brief and directed immediate action to resolve the issue.

Recommendation: The inspection team recommended immediate repair to the system.

Finding 1.15: On a few installations, fire doors in a few rooms and hallways did not operate properly.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel

Root Cause: Don't Know.

Discussion: These were isolated issues in barracks facilities. Some of the doors were improperly cut and others needed to be adjusted. Fire doors should close and latch automatically.

Recommendation: The inspection teams recommended that the chains of command and maintenance personnel periodically check all doors during routine inspections or WT Cadre visits, and submit work orders immediately for doors not in compliance.

Finding 1.16: At one installation, the majority of the rooms had stained mattresses.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Root Cause: Don't Know.

Discussion: The inspection team discovered that most of the mattresses in a UPH facility were stained. The team advised the chain of command to immediately contact their Preventive Medicine directorate, who conducted an assessment that same day. The Preventive Medicine SME determined prompt replacement for all the mattresses was necessary.

Recommendations: The inspection team recommended that all of the mattresses be replaced, based on the assessment of Preventive Medicine. In the short term, the team recommended that

the unit purchase appropriate covers for the mattresses. The inspection team also recommended that the Chain of Command/ Cadre check the mattresses during routine inspections.

Finding 1.17: At one installation, Assignment and Special Medical Requirements for a few WTs were not being met in leased housing.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.

Root Cause: Won't Comply.

Discussion: WTU leadership and health care providers implemented a Full Spectrum Discharge Program to assist WTs with their transition to civilian life. This methodology is considered a vital part of their therapy, as some WTs may return to homes that may not meet the Americans with Disabilities Act (ADA) or the Architectural Barriers Act (ABA) standards. The implementation of this policy is considered a beneficial measure in assisting WTs in the transition to facilities which may not meet the ADA standards. All WTs had full appreciation for the Full Spectrum Discharge Program and thought it was a good plan for transitioning them back to their civilian environment. However, it results in a violation of the DEPSECDEF Memo as it applies to assignment and special medical requirements.

Recommendations: The inspection teams recommended that the WTU leadership continue to work with the AMEDD leadership on the way ahead in requesting a waiver to allow continuation of this policy.

Finding 1.18: On a few installations, hot plates, toaster ovens, "George Foreman" grills, and candles were found in WT rooms. This is a recurring finding.

Standard: Memorandum, Deputy Secretary of Defense, 18 Sep 07, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel / Local SOP and local fire and safety regulations.

Root Cause: Don't Know.

Discussion: Most installations established local policies which prohibited hotplates, toaster ovens, "George Foreman" grills and similar cooking appliances. The inspection teams discovered a large number of prohibited cooking appliances. The teams determined that the local policies were either not well distributed or properly enforced. In each case, the unit leadership was notified and corrective actions were taken.

Recommendation: The inspection teams recommended that the chains of command routinely check for prohibited cooking appliances and candles during routine inspections or WT Cadre visits.

Observation 1.1: A few installations did not have fire evacuation plans posted to indicate means of primary/secondary egress.

Standard: Local SOP and local fire and safety regulations.

Discussion: Fire evacuation plans were not posted on room doors, hallways and near the exit signs to provide evacuation information to WTs and authorized visitors. Although the exit signs at all facilities inspected worked properly (illuminated), the local fire/safety SMEs recommended posting the fire evacuation plans.

Recommendations: The inspection team recommended the evacuations plans be posted in each room, the hallways and near the exit signs.

Observation 1.2: At a few installations, unsecured medications were found.

Standard: Local SOPs required medications be locked in safes provided in each room.

Discussion: The inspection teams and Nurse Case Managers found unsecured medications in rooms that house WTs. In some cases where Soldiers were present, on the spot corrections were made. It is vital that medications be placed in locked safes and out of reach of children and other visitors that may enter the facility.

Recommendations: The inspection teams recommended that the leadership continue to enforce the standards during routine inspections.

Observation 1.3: At some installations, the rooms were too cluttered.

Standard: Local UPH SOPs.

Discussion: There were cluttered conditions in some rooms. WTs acquire additional personal items, souvenirs, items from charities, donations, etc, over a period of time and their rooms become cluttered. The cluttered rooms have the potential to create a safety hazard.

Recommendation: The inspection teams recommended that the chains of command consider providing temporary storage facilities to eliminate the cluttered environment for WTs.

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Appendix 1 Directive



DEPARTMENT OF THE ARMY
MORESHERN REGIONAL MEDICAL COMMAND
WALTER REED ARMY MIGHCAL CONTEX
5900 GEORGIA AVENUE NW
WASHINGTON, M., 20307-SHIII

OCT 2 1 2010

MCAT-CG

MEMORANDUM FOR Northern Regional Medical Command Inspector General

SUBJECT: Directive for Inspection of Facilities Used to Hoose Warriors in Transition

- 1. You are directed to oversee and conduct a special inspection of the facilities used to house Warriors in Transition. This inspection will conclude no later than I September 2011.
- The inspection will focus on the following objective: Determine if facilities used to house Warriors in Transition are in compliance with Deputy Secretary of Defense memorandum, dated 18 September 2007, Subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel.
- You are authorized to task staff members, hispectors General assigned to Senior Mission Commanders and IMCOM, and are to have unlimited access to Army Activates, organizations, and all information sources to ensure the successful and timely completion of this inspection requirement.
- You will provide me with a mid-course progress review on or about 10 June 2013 followed by a written report not later than 12 September 2011.
- Point of consect is Mr. James Watson. Office of the Inspector General, at commercial (202), 782-3529 or DSN 662.



Appendix 2 Detailed Standards List

DEPUTY SECRETARY OF DEFENSE 101 0 DEFENSE PENTAGON WASHINGTON, DC 20301-1010

SEP 18 2007

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS UNDER SECRETARY OF DEFENSE FOR PERSONNEL AND READINESS UNDER SECRETARY OF DEFENSE FOR ACQUISITION, TECHNOLOGY AND LOGISTICS ASSISTANT SECRETARY OF DEFENSE FOR HEALTH AFFAIRS

SUBJECT: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel

The Wounded, Ill and Injured Senior Oversight Committee (WII-SOC), a joint DoDIDVA committee, met and approved the following policy changes on August 28, 2007.

Effective immediately, the Military Services will provide housing for medical hold and holdover personnel in accordance with the attached standards. These standards address baseline accommodations and special features and services that may be required depending on a member's medical condition and treatment plan. The Secretaries of the Military Departments are directed to use these standards for conducting the inspections required by section 3307 of the U.S. Troop Readiness, Veterans' Care, Katrina Recovery, and Iraq Accountability Appropriations Act, 2007 (Public Law 110-28), and to report inspection findings to the Under Secretary of Defense for Personnel and Readiness not later than October 31, 2007. Timely implementation of these standards is a top Department priority.

Attachment:

As stated

HOUSING INSPECTION STANDARDS FOR MEDICAL HOLD AND HOLDOVER PERSONNEL

1. PURPOSE

These standards shall be used as a basis for evaluating the adequacy of facilities that house medical hold and holdover personnel.

2. GENERAL

In general, medical hold and holdover personnel receiving outpatient medical treatment (hereafter referred to as MH personnel or MH members) shall be assigned or referred to housing that exceeds or meets the applicable quality standards and is appropriate for their medical





condition, expected duration of treatment, dependency status (including authorization of a non-medical attendant), and pay grade. The particular housing and associated amenities/services provided shall be an integral part of their medical treatment plan as determined by the primary care physician, patient, and chain of command. Note that some MH personnel with serious medical conditions are authorized non-medical attendants at the discretion of their primary care physician to assist in their recovery and rehabilitation. Non-medical attendants can include the member's parent, guardian, or another adult (18 or over).

3. APPLICABILITY

These standards address baseline accommodations, and any special medically needed facility features and services. Standards and guidance are also provided for associated furnishings, amenities, operations/services, and maintenance that are critical to well being and morale. These standards apply to the following types of housing when occupied by MH personnel: DoD-owned family housing (FH), DoD-owned unaccompanied personnel housing (UPH), Lodging owned by DoD, whether supported by appropriated funds or a non- appropriated funded instrumentality (NAFI). Lodging types include temporary duty (TDY) lodging, permanent change of station (PCS) lodging, recreational lodging, and military treatment facilities (MTF) lodging, e.g., Fisher Houses. Leased/contracted housing and lodging, to the maximum extent permitted by the associated agreement. Privatized housing and lodging, to the maximum extent permitted by the associated agreement. Note these standards do not apply to a service member's privately-owned home, or a rented home in the community (not privatized) that a service member obtains on his or her own.

4. PRIORITY FOR SERIOUS MEDICAL CONDITIONS AS A DIRECT RESULT OF ARMED CONFLICT

It is fitting those medical hold personnel who have "serious physical disabilities" or that are the "direct result of armed conflict have priority for housing and certain services. While the minimum housing standards are the same for all medical hold personnel, DoD has a special obligation to provide the best for seriously Wounded Warriors. Examples where priority should be considered include: housing waiting lists, furnishings and electronic equipment, parking spaces, time to respond to maintenance requests, etc. Furthermore, the housing status of these seriously Wounded Warriors should be monitored at the Service HQ level.

5. RESPONSIBILITIES

The chain of command shall be responsible, in consultation with the patient and the patient's medical support team and case managers, to validate that every MH member is adequately housed in accordance with these standards. Before a MH member is assigned/referred to housing (e.g., before transitioning from inpatient to outpatient status), the case manager shall provide consultation to the chain of command to ensure that the intended patient housing meets any special medical needs. If an assigned/referred housing unit for a member does not meet all the applicable standards in this document, the installation or garrison commander shall document the reasons why the standards were not met (authority can be delegated), and the respective Military Service headquarters must be notified no later than one week after the MH member takes occupancy.





- 1 For purposes of this provision, "serious physical disability" means: (a) any physiological disorder or condition or anatomical loss affecting one or more body systems which has lasted, or with reasonable certainty is expected to last, for a minimum period of 12 contiguous months, and which precludes the person with the disorder, condition or anatomical loss from unaided performance of at least one of the following major life activities: breathing, cognition, hearing, seeing, and age appropriate ability essential to bathing, dressing, eating, grooming, speaking, stair use, toilet use, transferring, and walking; or (b) serious psychological disabilities, such as post-traumatic stress disorder. (This definition is based primarily on 32 C.F.R. 199.2, the regulations for the CHAMPUS/TRICARE program.)
- 2 For purposes of this provision, "direct result of armed conflict" means there was a definite causal relationship between the armed conflict and the resulting unfitting disability. The fact that a member may have incurred a disability during a period of war or in an area of armed conflict or while participating in combat operations is not sufficient to support this finding. Armed conflict includes a war, expedition, occupation of an area or territory, battle, skirmish, raid, invasion, rebellion, insurrection, guerrilla action, riot, or any other action in which Service members are engaged with a hostile or belligerent nation, faction, force, or terrorists. Armed conflict may also include such situations as incidents involving a member while interned as a prisoner of war or while detained against his or her will in custody of a hostile or belligerent force or while escaping or attempting to escape from such confinement, prisoner of war, or detained status. (This definition is based on DoDl 1332.38, Physical Disability Evaluation, paragraphs E3.P5.2.2.1 and E3.Pfi.1.2.)

6. ASSIGNMENT

As a general rule, unless dictated otherwise by special medical requirements, MH personnel shall be assigned/referred to housing that exceeds or meets the applicable quality standards and that: (a) is appropriate for their expected duration of their treatment, (b) supports a non-medical attendant, if authorized, (c) supports accompaniment by their dependents when desired and not incompatible with their treatment, and (d) is appropriate for their pay grade (e.g., configuration and size). Note that from a housing assignment/referral perspective, an authorized non-medical attendant shall be treated like a dependant, e.g., if no other acceptable accommodations are available, a single MH member with an authorized non-medical attendant shall be eligible for temporary assignment to family housing. For example, MH personnel (whether single or married) with an authorized non-medical attendant and facing a long rehabilitation period should not be housed in a one-room lodging unit, but instead be provided with a lodging unit with a minimum of two bedrooms with a kitchen and living room (e.g., PCS lodging), or family housing (DoD-owned or privatized). When eligible for DoD-owned housing, MH personnel shall be included as part of "Priority I", as defined by DoDD 4165.63M, DoD Housing Management Manual. This referral priority should also apply to privatized or long-term leased (e.g., section 801) housing or lodging provided the referral is consistent with the privatized project's operating agreement. If appropriate housing is not available on the installation on which the member is receiving care, or at nearby military installations, and the service member does not reside in a privately-owned or rented home, MH personnel should be housed off the installation in private

sector accommodations that are appropriate for their expected duration of treatment, dependency status (at their treatment location), and pay grade unless dictated otherwise by special medical requirements.

7. BASELINE STANDARDS

Condition

All MH personnel housing must be in good overall condition with no major problems with any of the building systems, i.e., all are working properly and not at risk of imminent failure or malfunction. Building systems include but are not limited to roof, exterior walls, foundation, doors and windows, interior finishes, plumbing, lighting, electrical, life and fire safety, and heating-ventilating-and air-conditioning (HVAC). It is important that MH personnel be able to adequately control the temperature in their housing units. There shall be no mold, exposed lead-based paint, unsealed asbestos, inadequate air circulation, or any other environmental/safety/health hazard.

Kitchens

Kitchens are an important quality of life feature for MH personnel who face long rehabilitation periods, especially those with authorized non-medical attendants. Accordingly, kitchens shall be provided that exceed or meet existing applicable standards for the type of accommodations provided (unaccompanied housing, lodging, or family housing).

Laundry Facilities

Laundry facilities shall be provided as defined by the type of housing (unaccompanied personnel housing, lodging, or family housing), or as applicable based on medical condition. If an assigned/referred housing unit only has laundry equipment hook-ups, a residential-quality clothes washer and a dryer should be provided as loaned furnishings.

Furnishings

Provide loaned furnishings as appropriate.

Electronic Equipment

Generally, a television with cable/satellite service, internet service, and a telephone with local service shall be provided in each MH member's housing unit. If a MH member is unable to bring their personal electronic equipment to their assigned/referred housing, and they face a long rehabilitation period, efforts should be made to provide additional electronic devices such as a VCR/DVD player, stereo, computer with printer, and video game player. If the internet service is hard-wired, consideration should also be given to providing WiFi and a laptop computer.

Housekeeping and Pest Management

MH personnel housing shall be kept free of pests and litter, and trash containers shall be emptied on an appropriate cycle.

Landscaping, Grounds Maintenance, and Parking

Parking areas, turf, and grounds shall be well-maintained, attractive and litter-free. The number of parking spaces shall be adequate to support expected occupancy. Snow and ice shall be removed promptly from walkways and parking areas to ensure safety and prevent injuries.

Physical Security

MH member accommodations shall be provided with appropriate physical security measures, including required lighting levels inside and outside (parking and walkways).

Building Maintenance and Housekeeping Requests

An effective preventative maintenance program shall be in place for MH personnel housing. Also, installations shall have a mechanism where MH personnel can request building maintenance and housekeeping services.

8. <u>SPECIAL MEDICAL REQUIREMENTS</u>

Many MH members will have certain medical conditions that result in various functional limitations. For these members, it is essential that special accommodations and services be provided as an integral part of their medical treatment plan as determined by the primary care physician, patient, and chain of command. Some of these limitations will be permanent, but many others will change during recovery and rehabilitation, which may eliminate the need for certain special accommodations or services.

Accessibility

For members who have accessibility requirements, accommodations must, at a minimum, comply with the most current standards issued by the Department of Defense under the Architectural Barriers Act of 1968, as amended. Note that accessibility also applies to the route and distance (e.g., walkways, ramps, parking) that a MH member must travel from their housing accommodations to reach their medical treatment center, dining facility, or other support services. For all other MH member accommodations, consideration should be given to incorporating "universal design" principles (e.g., lever type door handles in lieu of knobs).

Cognition

When required, MH member accommodations shall address the range of cognitive limitations that result from conditions such as Traumatic Brain Injury (TBI), Post Traumatic Stress Disorder (PTSD), and stroke. For example, sometimes complex geometric patterns on rugs, linens, or flooring can cause disorientation in these patients. Flooring and carpet with a subtle texture or pattern often helps with depth perception.

Visual and Auditory

Necessary features for visually and auditorily impaired MH personnel shall be provided in accordance with the DoD standards.

Burns

MH personnel recovering from serious burns or nerve/neurological injuries are very sensitive to hot water, so consideration shall be given to installing special devices to regulate the water temperature.

Other Physical Limitations

Standard accessibility guidelines generally are adequate for ambulatory impaired MH personnel except in special cases such as when they are in a wheelchair with one or both legs in an extended position. In this case, normal wheelchair clearances and turning circles may be inadequate. Even with the loss of both legs, MH personnel can be fully ambulatory with their prostheses, but still need accessible accommodations when they are in a wheelchair (such as when they have to use the bathroom at night). For physically impaired MH personnel, bathrooms are the major source of concern. Suggestions for improvement include doors that open to the outside, additional clearance for wheelchairs, and longer hoses on shower nozzles. For MH personnel with loss of or injury to arms and hands, accommodations shall be provided with either a bidet bowl or an electrically powered 'add-on bidet' that replaces a normal toilet seat to rinse the peritoneal area.

Housekeeping

If a MH member without a non-medical attendant would have difficulty with basic housekeeping, it may be necessary to assign them to housing where these services are included with the accommodations, such as lodging, or to provide the required services for their housing unit such as by contract. Provide disposal of bio-hazard waste as required.

Laundry Services and Equipment

Special laundry service may also have to be provided for MH personnel who have a medical condition that requires their linens, towels, and clothing to be disinfected. In accessible units with a laundry, the clothes washer and dryer should be accessible from a wheelchair.

Kitchens and Food service

For certain medical conditions, a kitchen or kitchenette may be prescribed, either in the unit or located within the same building. On the other hand, there could be special dietary requirements that would be most effectively handled by a hospital or installation dining facility. Note that ranges and cook tops in accessible units shall have control knobs on the front for easy wheelchair access.

Furnishings

Accessible rooms need to have accessible furnishings, such as computer desks and higher beds.

Parking

MH personnel with mobility impairments shall have first priority in assignment and use of all parking spaces under the control of the facility, beginning with those spaces closest to the entrances and exits used by MH personnel. The next level of priority shall be extended to individuals who transport MH personnel with these types of disabilities. If possible, spaces shall





be provided for pickup and drop-off in addition to daily and overnight use. The number of spaces shall be adequate to support the expected occupancy, including the required number of accessible spaces. Additional spaces shall be provided on an expedited basis to meet unforeseen needs.

Proximity to Outpatient Treatment Center and Other Services

MH personnel may require housing in close proximity to a medical treatment facility for reasons related to their disabilities or medical conditions. For example, there may be a substantial risk of unanticipated urgent medical situations that require prompt attention by caregivers, or the frequency and duration of routine medical treatment may dictate the need for housing nearby. Transportation must be provided for MH personnel who do not have their own means of transport (e.g., transportation by a non-medical attendant with a POV) and who are not housed adjacent to their outpatient medical treatment facilities (whether on or off the installation). This transportation must be adequate to ensure timely access to treatment, dining facilities, and other important support facilities such as exchanges and commissaries.

9. **INSPECTIONS**

The Military Services shall conduct periodic inspections of MH personnel housing in accordance with these standards, at least on an annual basis. Inspections of privatized housing and lodging containing MH personnel shall be accomplished only with prior coordination with the project partner or owner. In the event a deficiency is identified, the commander of such facility shall submit to the Secretary of the Military Department a detailed plan to correct the deficiency; and the commander shall re-inspect such facility not less often than once every 180 days until the deficiency is corrected.

10. FEEDBACK AND UPDATES

The Military Services shall implement periodic and comprehensive follow-up programs using surveys, one-on-one interviews, focus groups, and town-hall meetings to learn how to improve MH personnel housing and related amenities/services. Such feedback should be solicited from the MH members, their families and friends, care-givers, chain of command, and housing owners/operators. Summaries of the feedback with resulting changes should be provided on a periodic basis to OSD, in conjunction with any other reporting requirements.

11. **IMPLEMENTATION**

The Military Departments have the authority to issue supplemental instructions to provide for unique requirements within their respective organizations provided they conform to the basic policy guidance in this document.

Appendix 3 Acronym List

ABA	Architectural Barriers Act			
ADA	American Disabilities Act			
ALARACT	All Army Activities			
CFR	Code of Federal Regulation			
DEPSECDEF	Deputy Secretary of Defense			
DoD	Department of Defense			
DPW	Directorate of Public Works			
HVAC	Heating, Ventilation, and Air Conditioning			
IG	Inspector General			
IM	Information Management			
IMCOM	Installation Management Command			
MEDCOM	US Army Medical Command			
MH	Medical Hold			
MSDS	Material Safety Data Sheets			
NRMC	Northern Regional Medical Command			
PTSD	Post Traumatic Stress Disorder			
RMC	Regional Medical Command			
SMC	Senior Mission Commander			
SME	Subject Matter Expert			
SOP	Standard Operating Procedures			
TBI	Traumatic Brain Injury			
UPH	Unaccompanied Personnel Housing			
WT	Warrior in Transition			
WTB	Warrior Transition Brigade			
WTU	Warriors in Transition Unit			
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Appendix 4 References

ALARACT 295/2008, 9 December 08, subject: MOD 1 to ALARACT 162/2008

ALARACT 162/2008, 3 July 2008, subject: Inspection of Armed Forces Facilities Used to House Recovering Service Members Assigned to Army Warrior Transition Units

Army Regulation 420-1, Army Facilities Management, 12 February 2008

National Defense Authorization Act (NDAA), Public Law 110-181, Sec 1662, 28 January 2008, subject: Access of Recovering Service Members to Adequate Outpatient Residential Facilities

Memorandum, Deputy Secretary of Defense, 18 September 2007, subject: DoD Housing Inspection Standards for Medical Hold and Holdover Personnel

Memorandum, Deputy Chief of Staff, G-1, HQDA, 18 June 2007, subject: Housing Prioritization for Warriors in Transition

Memorandum, Assistant Chief of Staff for Installation Management (IMCOM), 14 October 2009, Subject: Unaccompanied Personnel housing (UPH) for Warriors in Transition